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\* *Pro Hac Vice* admission pending

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*Attorneys for Defendant Church & Dwight Co., Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

TAMMY DEVANE,  
  
Plaintiff,

v.

CHURCH & DWIGHT CO., INC.,  
  
Defendant.

Civ. No. 3:19-cv-09899 (BRM) (LHG)

**Motion Date:** July 15, 2019

*Document Electronically Filed*

**Oral Argument Requested**

**DEFENDANT CHURCH & DWIGHT'S NOTICE OF MOTION TO DISMISS  
PLAINTIFF'S CLASS ACTION COMPLAINT**

**PLEASE TAKE NOTICE** that, on July 15, 2019, or at such other date and time as the Court shall designate, the undersigned, attorneys for Defendant Church & Dwight Co., Inc. (“Church & Dwight”), will, and hereby do, respectfully move the Honorable Brian R. Martinotti, U.S.D.J., presiding at the United States District Court for the District of New Jersey, Fisher Fed. Bldg. & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order, pursuant to Rules 12(b)(6) and 12(b)(1) of the Federal Rules of Civil Procedure, the doctrine of primary jurisdiction and New Jersey choice of law rules, dismissing Plaintiff’s Class Action Complaint in its entirety with prejudice.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Defendant Church & Dwight will rely upon the memoranda of law filed in connection with its motion, the Declaration of Baldassare Vinti and accompanying exhibits, all other pleadings on file in this action and any oral argument permitted by the Court.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested in the event there is opposition to this Motion.

Dated: June 7, 2019

Respectfully Submitted,

s/ Alychia L. Buchan

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